

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
SUNG KOOK (BILL) HWANG and :  
PATRICK HALLIGAN, :  
:  
Defendants. :  
-----X

22 Cr. 240 (AKH)

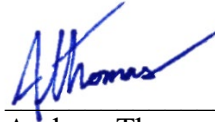
**DECLARATION OF  
ANDREW THOMAS**

I, Andrew Thomas, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an Assistant United States Attorney and one of the federal prosecutors with responsibility for this matter.
2. Attached hereto as Exhibit A is a true and correct copy of a portion of a February 25, 2021 Instant Bloomberg thread between Bill Hwang and others, bearing Bates stamp SDNY\_SWR\_0000295410.
3. Attached hereto as Exhibit B is a true and correct copy of a portion of a January 26, 2021 Instant Bloomberg thread between Bill Hwang and others, bearing Bates stamp SDNY\_P001\_0000365703.
4. Attached hereto as Exhibit C is a true and correct copy of a November 8, 2021 letter from King & Spalding to the Securities and Exchange Commission, beginning with Bates stamp SDNY\_P003\_0000000507.
5. Exhibit D, which is an excel file that will be provided natively to the Court, is an illustrative comparison of data contained in the Morgan Stanley execution records and the Bloomberg EMSX data.
6. Attached hereto as Exhibit E is a true and correct copy of an October 26, 2022 redacted email from AUSA Alex Rossmiller to paralegal members of the prosecution team.
7. Attached hereto as Exhibit F is a true and correct copy of the Government's notice of the anticipated expert testimony of Professor Robert Battalio.

8. Attached hereto as Exhibit G is a true and correct copy of the Government's notice of the anticipated expert testimony of Dr. Carmen Taveras.

Dated: New York, New York  
January 12, 2024



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Andrew Thomas  
Assistant United States Attorney  
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